

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK**

In re Terrorist Attacks on September 11, 2001

03 MDL 1570 (GBD) (FM)  
ECF Case

This document relates to:

*Burnett, et al. v. The Islamic Republic of Iran, et al.*, Case No. 15 CV 9903 (GBD)(SN)

**NOTICE OF MOTION TO VACATE  
PARTIAL FINAL JUDGMENTS**

For the reasons set forth below and in the declaration of John M. Eubanks (“Eubanks Declaration”), attached hereto, undersigned counsel respectfully moves this Court, pursuant to Fed. R. Civ. P. 60, to vacate the final judgment of solatium damages awards for five (5) *Burnett* plaintiffs. Each of these *Burnett* plaintiffs previously moved this Court for final damages judgments against the Islamic Republic of Iran (“Iran”) and judgments were entered against *inter alia* the Islamic Republic of Iran. See ECF No. 5848 (Danielle McGuire, Mara McGuire, Ryan P. McGuire, Sean P. McGuire, and Shea E. McGuire).

Plaintiffs respectfully ask that this Court grant the Proposed Order filed contemporaneously with this motion; vacate the damages judgments awarded to the referenced five (5) *Burnett* Plaintiffs only; and otherwise leave the Order docketed at ECF No. 5848 in force.

Dated: September 17, 2020  
Mount Pleasant, South Carolina

Respectfully submitted  
MOTLEY RICE LLC

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